



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUN 2 1993

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PRIORITY

MEMORANDUM:

SUBJECT: PP2E4113: Chlorothalonil (Bravo 720) in or on Filberts. Response to CBTS Review #9825 (Memo of W.T. Chin dated November 26, 1992, D#177602, MRID #422729-01). Evaluation of Revised Section B. CBTS #11387
DP Barcode #D188219
EPA Reg. No. 50534-188
No MRID #

FROM: María Isabel Rodríguez, Chemist
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THROUGH: Philip V. Errico, Section Head
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TO: Hoyt Jamerson
Product Manager Team #43
Emergency Response and Minor Use Section
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*Mania Isabel Rodriguez
June 2, 1993.*

Philip V. Errico

As requested in CBTS Review #9825 (Memo of W.T. Chin dated November 26, 1992, D#177602, MRID #422729-01), IR-4, on behalf of the Agricultural Experiment Station of Oregon, is submitting a revised Section B for review. A revised (January 14, 1993) Proposed Supplemental Label for chlorothalonil (2,4,5,6-tetrachloroisophthalonitrile) formulated as Bravo 720 was also submitted for review.

Discussion:

As expressed in Conclusion #2 of CBTS Review #9825, the petitioner was requested to clarify the exact amount of water to be applied by Acre in each



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application.

The petitioner explained that they had talked to Mr. Joel Garbus (CBTS) about the label change. In the submitted letter, they explain that about 90% of the applications would be made at 100 to 200 gallons of water per acre. It is specified that mature orchards may need up to 400 gallons of water per acre.

The petitioner explained that the residue trials had been performed using 4.5 lbs ai/Acre/application (1.5X) as opposed to the maximum application rate of 3 lbs ai/Acre/application. Spray volumes of 110 and 184 gallons of water per acre were used. This represented a worst case scenario. As was explained in CBTS Review #9825, similar results as those obtained for the exaggerated application would be expected for the proposed applications at the rate of 3 lbs ai/Acre/application.

The revised Proposed Supplemental Label for Bravo 720 submitted for review includes the following changes in the introductory paragraph for *Tree and Orchard Crops*. The changes are as follows and are denoted by quotation marks.

-The first sentence reads: *Apply BRAVO 720 in sufficient water "(see below for specific volumes of water and specific crops)" and with*

-The third sentence reads: *If application BRAVO 720 may be applied with aircraft "using at least 20 gallons per acre."*

It should be noted that only two trials were performed and these were for ground applications with more than 110 gallons of water per acre. No data exists for ground or aerial application supporting use of only 20 gallons of water per acre. Our concern is that the higher concentration of pesticide in the spray solution may lead to higher residues in filberts. For orchard applications we require separate data to support dilute and concentrated sprays.

Section B should be revised to specify a minimum spray volume of 100 gallons of water per acre for ground applications using the requested application rate of 3 lbs ai/Acre/application. The revised label should be submitted for our review..

The deficiency is not considered to be resolved.

Recommendations:

Pending submission of a revised Section B specifying a minimum spray volume of 100 gallons of water per acre and toxicological considerations permitting, CBTS recommends for the establishment of a tolerance with regional

registration for use in Oregon only for the combined residues of the fungicide chlorothalonil (2,4,5,6-tetrachloro-isophthalonitrile) and its metabolite 4-hydroxy-2,5,6-trichloro-isophthalonitrile in or on the raw agricultural commodity filbert at 0.1 ppm.

cc: MIRodríguez, PP2E4113, Circulation, Reading File.

RDI: P. V. Errico (6-1-1993), R. A. Loranger (6-2-1993)

M. I. Rodríguez: Draft (5-28-1993), Edited (6-2-1993): H7509C/CBTS/CM#2, Room 804-T/703-305-6710

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